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Attorneys for Defendant
OTIS ELEVATOR COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARIA CHAIDEZ DE HERRERA,
individually,

Plaintiff,

v.

OTIS ELEVATOR COMPANY, a foreign
corporation; TK ELEVATOR
CORPORATION, a domestic corporation; TK
ELEVATOR CORPORATION, a foreign
corporation; TK ELEVATOR
MANUFACTURING, INC., a foreign
corporation; DOES 1 through 30, inclusive; and
ROE BUSINESS ENTITIES 4 through 30,
inclusive,

Defendants.

Case No. 2:24-cv-01122-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND REPLY DEADLINE
FOR DEFENDANT OTIS
ELEVATOR COMPANY'S
MOTION FOR SUMMARY
JUDGMENT**

IT IS HEREBY STIPULATED AND AGREED, by all parties, by and through their respective counsel of record, that the deadline for Defendant Otis Elevator Company to file a reply to Plaintiff's Response to Motion for Summary Judgment, currently due June 20, 2025, shall be extended to July 21, 2025.

Defendant Otis Elevator Company filed a Motion for Summary Judgment [Dkt. #40] on April 1, 2025. Plaintiff filed a Response to Defendant Otis Elevator Company's Motion for Summary Judgment on April 28, 2025 [Dkt. #43] and an Errata to Plaintiff's Response to Defendant Otis Elevator Company's Motion for Summary Judgment on April 30, 2025 [Dkt. #44].

Counsel for Plaintiff and Otis met and conferred and Plaintiff agreed to dismiss the non-product liability causes of action *only* against Otis pursuant to NRS 11.202. On June 4, 2025, the Order granting Stipulation for Dismissal of Plaintiff's First, Second, Fourth, Fifth, and Sixth Causes of Action as to Otis was entered. [Dkt. #50] The only remaining claims are Plaintiff's product liability claims against Otis. Good cause exists for this request because the parties conducted an inspection of the Subject Elevator on May 21, 2025. The expert are in the process of reviewing their observations and opinions based on the completed inspection and need additional time to determine whether the product liability claims should remain against Otis. Extending the deadline will allow the parties to complete the necessary discovery for the summary judgment motion and ensure that the Court has the full context to make an informed decision.

This requested extension is made in good faith and not for the purposes of delay.

Respectfully Submitted By:
TUCKER ELLIS, LLP

/s/ Su-Lyn Combs

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Respectfully Submitted By:
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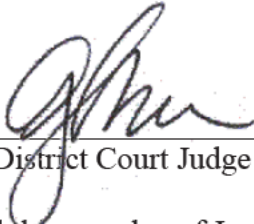
/s/ Paul R.M. Cullen

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Attorneys for Plaintiff

ORDER

Based on the parties' stipulation [ECF No. 51] and good cause appearing, IT IS ORDERED that the deadline to reply to Plaintiff's Response to Motion for Summary Judgment is extended to July 21, 2025.



U.S. District Court Judge

Dated this 9 day of June, 2025.

CERTIFICATE OF SERVICE

I hereby certify that on **June 6, 2025**, a copy of the foregoing **STIPULATION AND ORDER TO EXTEND REPLY DEADLINE FOR DEFENDANT OTIS ELEVATOR COMPANY'S MOTION FOR SUMMARY JUDGMENT** was filed and served electronically via the Court's CM/ECF electronic filing system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Su-Lyn Combs

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